

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

TECSPEC LLC, RICHARD ROSE, ROBERT SENIA,  
and RALPH SCHLENKER,

Plaintiffs,

v.

MICHAEL DONNOLO, JOSHUA DONNOLO,  
JOHN MICHAEL LONG, BRAYA CONCEPTS  
LLC, BRAYA MACHINE COMPANY LLC,  
BRAYA SYSTEMS LLC, BRAYA VENTURES  
LLC, ABC CORPORATIONS 1-10,

Defendants.

Case No. 1:24-cv-08077-JHR

**ORDER TO SHOW CAUSE**

BRAYA CONCEPTS LLC, BRAYA MACHINE  
COMPANY LLC, BRAYA SYSTEMS LLC, BRAYA  
VENTURES LLC, JOHN MICHAEL LONG,  
JOSHUA DONNOLO, and MICHAEL DONNOLO,  
individually and derivatively on behalf of Tecspec  
LLC,

Counterclaim Plaintiffs,

v.

RALPH SCHLENKER, ROBERT SENIA,  
RICHARD ROSE, SRS ENTERPRISES INC., SRS  
ENTERPRISES NJ LLC, HVAC SERVICE  
ASSOCIATES, TECSPEC LLC, and SRS RESEARCH  
LLC,

Counterclaim Defendants.

Upon Defendants/Counterclaim Plaintiffs' Memorandum of Law in Support of their Motion for a Temporary Restraining Order, Preliminary Injunction and the Appointment of a Receiver, dated April 2, 2025, together with all papers annexed thereto, pursuant to Federal Rule of Civil Procedure 65, it is hereby:

**ORDERED** that the above-named Counterclaim Defendants, Ralph Schlenker, Robert Senia, Richard Rose, SRS Enterprises, Inc., SRS Enterprises NJ LLC, HVAC Service Associates, and SRS Research, LLC (collectively, "Counterclaim Defendants"), show cause before this Court, at Courtroom 12B, United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007, on \_\_\_\_\_, 2025, at \_\_\_\_\_ o'clock, or as soon as counsel may be heard, why an order should not be issued:

- (i) Pursuant to Rule 65 of the Federal Rules of Civil Procedure, enjoining Counterclaim Defendants from:
  - (a) unlawfully competing against Tecspec LLC ("Tecspec") in violation of Tecspec's Operating Agreement;
  - (b) (i) diverting corporate resources from Tecspec by "selling" Tecspec inventory to the SRS Entities at amounts unprofitable to Tecspec; and (ii) improperly recharacterizing Tecspec loan proceeds as profits and diverting such proceeds to SRS Owners;
  - (c) unreasonably interfering with the business opportunities of Counterclaim Plaintiffs Braya Concepts LLC, Braya Machine Company LLC, Braya Systems LLC and Braya Ventures LLC (the "Braya Entities");
  - (d) retaining photographs, materials, and any other confidential information that were indisputably stolen from the Braya Entities' facility; and
- (ii) Appointing a receiver to oversee Tecspec during the pendency of this litigation; and it is further

**ORDERED**, at the time this Order is issued, neither Braya Concepts LLC, Braya Machine, Company LLC, Braya Systems LLC, Braya, Ventures LLC, John Michael Long, Joshua Donnolo, nor Michael Donnolo (Counterclaim Plaintiffs) are currently restrained or enjoined from entering into any new contracts with businesses desiring to conduct business with any of the Counterclaim Plaintiffs,

**ORDERED**, through to the determination of this motion, Counterclaim Defendants are restrained and enjoined from interfering with Counterclaim Plaintiffs' fulfillment of Counterclaim Plaintiffs' new and existing contracts,

**ORDERED**, through to the determination of this motion, Counterclaim Defendants are restrained and enjoined from unreasonably interfering with Counterclaim Plaintiffs' business opportunities, which includes dissemination of false or defamatory statements concerning the disposition of this case, false statements concerning the status or nature of Counterclaim Plaintiffs' ability to perform or fulfill contracts, threats against Counterclaim Plaintiffs' business prospects, and any other defamatory information designed to interfere with Counterclaim Plaintiffs' business prospects.

**ORDERED**, that a copy of this order, together with the papers upon which it is granted, be served via email upon Counterclaim Defendants' attorneys on or before \_\_\_\_\_ 2025, and that such service be deemed good and sufficient.

Dated: April \_\_\_\_, 2025  
New York, New York

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The Honorable Jennifer H. Rearden,  
United States District Judge